

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
1199SEIU, UNITED HEALTHCARE  
WORKERS EAST,

Plaintiff,

-against-

RITE AID CORPORATION and  
THE JEAN COUTU GROUP (PJC), INC.,  
THE JEAN COUTU GROUP USA, INC.,  
d/b/a BROOKS ECKERD DRUG STORES,

Defendants.  
-----X

07 cv. 04816 (GBD)

**MOTION TO ADMIT  
COUNSEL PRO HAC  
VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District  
Courts for the Southern and Eastern Districts of New York, I, Scott B. Gilly, a member in  
good standing of the bar of this Court, hereby move for an Order allowing the admission  
pro hac vice of:

Stephen M. Silvestri  
Miles & Stockbridge, P.C.  
10 Light Street  
Baltimore, MD 21202  
Telephone: (410) 727-6464  
Facsimile: (410) 385-3700  
E-mail: [ssilvestri@milesstockbridge.com](mailto:ssilvestri@milesstockbridge.com)

Stephen M. Silvestri is a member in good standing of the Bar of the State of  
Maryland. Attached as Exhibit A is a Certificate of Good Standing for Mr. Silvestri.  
There are no pending disciplinary proceedings against Mr. Silvestri in any State or  
Federal Court.

Attached as Exhibit B is an affidavit of the undersigned sponsoring attorney.

617957 \$25 6-12-07 MG

Dated: June 12, 2007  
New York, NY

Respectfully submitted,

THOMPSON WIGDOR & GILLY LLP

By:   
Scott B. Gilly (SG-5861)

The Empire State Building  
350 Fifth Avenue, Suite 5720  
New York, New York 10118  
Telephone: (212) 239-9292  
Facsimile: (212) 239-9001

Counsel for Defendant Rite Aid Corporation

**Court of Appeals  
of Maryland**  
Annapolis, MD



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the ninth day of November, 1979,*

**Stephen Michael Silvestri**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
seventh day of June, 2007.*

A handwritten signature in cursive script, reading "Alexander L. Cummings".  
Clerk of the Court of Appeals of Maryland

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**AFFIDAVIT OF  
SCOTT B. GILLY  
IN SUPPORT OF  
MOTION TO ADMIT  
COUNSEL PRO HAC  
VICE**

Scott B. Gilly, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Thompson Wigdor & Gilly LLP, counsel for Defendant Rite Aid Corporation ("Rite Aid") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Rite Aid's motion to admit Stephen M. Silvestri as counsel pro hac vice to represent Rite Aid in this matter.
2. I am a member in good standing of the bar of the State of New York. I am also admitted to practice before the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. Mr. Silvestri is a principal at Miles & Stockbridge, P.C., in Baltimore, Maryland.
4. I have found Mr. Silvestri to be a skilled attorney and a person of integrity. He is experienced in Federal practice, is fully familiar with the Federal Rules of Civil Procedure, and has familiarized himself with the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York and this Court's Individual Practices.
5. Accordingly, I am pleased to move the admission of Mr. Silvestri, pro hac vice.
6. I respectfully submit a proposed order granting admission of Stephen M. Silvestri, pro hac vice, which is attached hereto as Exhibit 1.

WHEREFORE, it is respectfully requested that the motion to admit Stephen M. Silvestri, pro hac vice, to represent Defendant Rite Aid Corporation in the above captioned matter, be granted.

Dated: June 12, 2007

  
\_\_\_\_\_  
Scott B. Gilly

Sworn to before me this 12<sup>th</sup>  
day of June 2007

  
\_\_\_\_\_  
Notary Public

VIRGINIA GENTILE  
Notary Public, State of New York  
No. 01GE4960908  
Qualified in Nassau County  
Commission Expires January 2, 20 10

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**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Scott B. Gilly, attorney for Defendant Rite Aid Corporation,  
and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Stephen M. Silvestri  
Miles & Stockbridge, P.C.  
10 Light Street  
Baltimore, MD 21202  
Telephone: (410) 727-6464  
Facsimile: (410) 385-3700  
E-mail: [ssilvestri@milesstockbridge.com](mailto:ssilvestri@milesstockbridge.com)

is admitted to practice pro hac vice as counsel for Defendant Rite Aid Corporation in the  
above captioned case in the United States District Court for the Southern District of New  
York. All attorneys appearing before this Court are subject to the Local Rules of this  
Court, including the Rules governing discipline of attorneys. If this action is assigned to  
the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF  
password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of  
the Court.

Dated: June \_\_, 2007  
New York, New York

\_\_\_\_\_  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Motion to Admit Counsel Pro Hac Vice, sponsoring affidavit of Scott B. Gilly, and proposed order were served via Overnight Mail, this 12<sup>th</sup> day of June 2007, upon the following counsel for Plaintiff:

Allyson L. Belovin, Esq.  
Levy Ratner, P.C.  
80 Eighth Avenue, 8<sup>th</sup> Floor  
New York, NY 10011

  
\_\_\_\_\_